

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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May 9, 2023


Via ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

REQUEST GRANTED.

The Court appoints CJA counsel Deveraux Cannick for the limited purpose of consultation on the pending plea offer as requested. The Clerk of Court is respectfully directed to add Mr. Cannick to the docket.

5/10/2023 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

**Re: United States v. Raquel Moura Borges
21 Cr. 172 (LJL)**

Dear Judge Liman,

I write to respectfully request that the Court appoint CJA counsel for Ms. Borges for the limited purpose of advising her on the Government's recent plea offer. The Government does not object to this request.

Ms. Borges has been charged criminally with securities fraud, wire fraud, and investment adviser fraud, and is also a defendant in a parallel civil enforcement proceeding brought by the Securities and Exchange Commission involving many of the same allegations. After negotiations, the Government and S.E.C. have extended a plea offer and settlement proposal, respectively. Given the complexity of this case and the intricacies of any global resolution, Ms. Borges has requested the opportunity to consult with another attorney from a different office regarding a potential disposition. Ms. Borges is not currently requesting that Federal Defenders be replaced; she is requesting that CJA counsel be appointed for the limited purpose of consultation on the pending plea offer. Because I agree that Ms. Borges would benefit from the opportunity to discuss her options with outside counsel, I join in this request. Other courts in this District have similarly approved the appointment of CJA counsel for the limited purpose of consultation relating to plea offers in similar circumstances. *See, e.g., United States v. Jones*, 21 Cr. 59 (LAP) (S.D.N.Y. Apr. 13, 2021), Doc. 19. We thank the Court for its consideration.

Respectfully submitted,

/s/

Neil P. Kelly
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cc: AUSA Andrew Thomas